



Finkelstein, Blankinship,
Frei-Pearson & Garber, LLP

1 NORTH BROADWAY, SUITE 900
WHITE PLAINS, NY 10601
Phone: (914) 298-3281
Fax: (845) 562-3492
www.fbfglaw.com

March 18, 2021

Via ECF

The Honorable Lorna G. Schofield
Courtroom 1106
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Henao v. Parts Authority*, Case No. 1:19-cv-10720-LGS-BM

Dear Judge Schofield,

Pursuant to the Court's March 11, 2022 Order to Provide Billing Records, ECF No. 203, please find attached copies of Plaintiffs' billing records documenting, for each attorney, the date, the hours expended, and the nature of the work done.

Plaintiffs' counsel did not contemporaneously record all time due to Plaintiffs' counsel's belief that this case would ultimately settle with Plaintiffs' counsel receiving a substantially negative lodestar. This belief has proven correct, as the fees Plaintiffs' counsel seek in this matter are a fraction of the fees incurred. Thus, for example, there are no billing entries for multiple depositions that Plaintiffs' counsel traveled out of state to defend (Jeremiah Frei-Pearson traveled to Washington, D.C. and to Maryland to prepare clients for deposition and to defend the depositions in person). As another example, Plaintiffs' counsel finalized the *Cheeks* letter on January 21, 2022 and did not receive final directive to file from all Plaintiffs until March 2, 2022. During that time, Plaintiffs' counsel had additional communications with Plaintiffs which were not recorded in Plaintiffs' billing records, due to the settlement. Plaintiffs' counsel does not submit any billing records of any time that was not contemporaneously recorded. However, as officers of the Court, Plaintiffs' counsel estimate that counsel spent well over 50 hours on this matter that was not recorded.

Attached as Exhibit 1 is a copy of Finkelstein, Blankinship, Frei-Pearson, & Garber's billing records on this matter. Attached as Exhibit 2 is a copy of Mark Potashnick's billing records on this matter. Plaintiffs' counsel are aware of Your Honor's Individual Rules I.B.1. which directs that communications with Chambers not exceed two pages, including exhibits. Plaintiffs' counsel respectfully requests leave to file a communication with exhibits that exceeds two pages because Plaintiffs' counsel's billing records exceed two pages.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

/s/Jeremiah Frei-Pearson

Jeremiah Frei-Pearson
Andrew White
Amanda Chan
**FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP**
One North Broadway, Suite 900
White Plains, New York 10601
Telephone: (914) 298-3281
Facsimile: (914) 824-1561
jfrei-peerson@fbfglaw.com
awhite@fbfglaw.com
achan@fbfglaw.com

WEINHAUS & POTASHNICK

Mark Potashnick, MO Bar # 41315
(admitted *pro hac vice*)
11500 Olive Blvd., Suite 133
St. Louis, Missouri 63141
Telephone: (314) 997-9150 ext. 2
Facsimile: (314) 984-810
markp@wp-attorneys.com

cc: All counsel of record (Via ECF)